



4 June 2024

Senate Environment and Communications Committee  
PO Box 6100  
Parliament House  
Canberra ACT 2600

By email only to [ec.sen@aph.gov.au](mailto:ec.sen@aph.gov.au)

Dear Committee Secretary,

**RE: INQUIRY INTO THE MIDDLE ARM INDUSTRIAL PRECINCT**

Thank you for the opportunity to provide a response to the matters referred to in the additional information from Mr Tapp and Dr Phelan. This response is limited to the matters that are purporting to reflect adversely on the organisation only of HydrEra Water Services Pty Ltd (“HydrEra”).

Whilst HydrEra is not required to respond, it acknowledges the submissions and seeks to provide the relevant corrections to assist the community in understanding the facts relating to HydrEra’s operations.

This response is prepared with an objective view, based on a review of facts and knowledge of HydrEra’s operations.

Since 2013 internationally and 2020 in Australia, HydrEra has been a small locally operated environmental company dedicated to providing the highest standards of fluid storage and water/fluid resource management services. HydrEra is committed to the maintenance of all legislative compliance with relevant environmental laws and regulations, including the *Environment Protection Act 2019* (NT), *Environmental Protection and Biodiversity Conservation Act 1999* (NT) and the *Water Act 1992* (NT).

HydrEra is not affiliated to and does not currently have intention to be affiliated with the “Middle Arm Industrial Precinct”. There is no indication otherwise provided that would incite the involvement of HydrEra with the “Middle Arm Industrial Precinct” unless it was in support of the company being presented as an environmental, industrial service and supply company with a focus in water and or water reuse management.

**1.0 Information from Mr Tapp and Dr Phelan**

There is misinformation presented by the petitioners within their submission. Such information misrepresents the brand of “HydrEra”, our employees, our operations, and the industries supported by our work. It also detracts from effective resource management we provide.

The balance of these submissions seeks to respond to the evidence proposed by Mr Tapp and Dr Phelan in relation to the organisation insofar as they are inaccurate.

### 1.1 'Water Treatment Plant'

The submissions refer to a 'water treatment plant' which is indeed better referred to as an Evaporation Storage Facility. Regarding this, it is understood there are allegations of 'pollution' and 'environmental harm'. In the petitioner's submission rainwater is being incorrectly classified as produced/waste fluid, static evaporation operations are being misrepresented as mechanical recycling facilities, and an idle light vehicle trailer, generator and hoses are being presented as equipment used to move dirty water off location. This is not correct.

In response, HydrEra submits that the operations at Warumungu, NT near Tennant Creek is repurposing of a previously abandoned abattoir in which it underwent extensive environmental assessments and public consultations over a 1.5-year period, prior to commencement of site operations. Such actions included securing necessary Environmental Protection Agency (EPA) approvals, Aboriginal Areas Protection Authority (AAPA) approvals, and council approvals. Further to that, there was consultation regarding the *Waste Management and Pollution Control Act 1998*, *Environment Protection Act 2019* (NT), as well as Department of Energy and Mines. All such endorsements and approvals were completed and executed prior to the commencement of onsite operations and continue to be followed today during current operations in which there is a record of zero operational incidents including zero spills.

In addition, we continue to maintain strict ecological compliance at our facility which is equipped with not only advanced environmental and fluid/water protection technologies but also cloud-based satellite solar powered leak detection with onsite fluid level monitoring. Secondary containment redundancy and precautions are imbedded in our fill procedure as well as our double lined storage containment systems. Supplementary efforts are in place to round off protective measures via a third level of containment that accounts for up to 110% of onsite capacity. This tertiary safeguard is the configuration of our engineered above ground storage tanks within an engineered and compacted clay berm location as added redundancy. All these protective provisions were designed to exceed current environmental standards and to ensure no harmful impact on the surrounding ecosystem. In short, the location is designed to manage well over double redundancy when it comes to protecting the surrounding area from any unforeseen event regardless of the cause.

All tanks at the site are part of a closed system with no discharge to the environment. Rainwater collected in containment areas are tested, managed, and used strictly according to the highest environmental and safety standards. The concrete stormwater sumps in the corners of containment berms do not connect to any tanks and do not connect externally from the containment area. They are in place to provide a low point for a stormwater to drain to and for a sump pump to be submerged as well as to allow for testing and subsequent pumping of uncontaminated rainwater out of containment area during big weather events pending on contamination or loss of containment has not occurred in containment area which is double verified by calibrated water analysis testing and sampling prior to any discharge.

The referenced ladders are commercial ladders temporarily placed near the fill line for tank dips, inspections, and used when verifying pump is primed and fluid is flowing into the tank when unloading tankers or pumping rainwater into the tank with pumps. The small pump priming hose labelled as a garden hose, is tied off well above the water surface level. This is not a siphon hose. This small hose is used during pump priming when pumping into the tank. This feature was added to ensure not even the smallest drop of waste fluid could be released. Lastly the one specific tank which they indicated to be contaminated waste was and still is full of only rainwater and

fresh water and is fitted with an escape ladder and fauna escape. All tanks onsite are maintained with 1000mm freeboard in preparation of a 1000-year rain event.

The tanks at HydrEra's NT Facility had been initially used for the storage of rainwater and fresh water, during the hydro testing phase of the tanks prior to their operational commissioning. Additionally, this stored water was made available at no cost to local firefighters for emergency use in the event of significant fires in the vicinity. It is important to note that at the time the one tank was photographed for this inquiry it was inaccurately described as storing contaminated fluid, however had not received a single drop of any waste fluids at all.

### *1.2 Photographs/Samples in Submissions*

It is noted there are inclusions of photographs throughout the submissions of allegedly HydrEra locations which are not publicly available. It is unknown how these photos have been obtained or where they originated from. There will be further investigations in this regard as to the authenticity of such evidence, and until such time we request that it is not considered for publication by the committee.

It is refuted the reliability of any samples purportedly collected by petitioners, assumedly unqualified and unauthorised, through potentially illegal means, as suggested. HydrEra has neither requested nor granted permission for sample collection to any parties other than accredited environmental agencies and NATA accredited laboratories. Samples taken without proper authorisation and testing experience lack credibility and cannot be authenticated. Moreover, without the application of stringent professional testing, and sampling procedures such samples should not be considered dependable in any regard.

HydrEra adheres to rigorous testing protocols and conducts regular sampling to maintain operational consistency and ensure environmental compliance. Only samples collected and tested under these established procedures can be trusted for accuracy and reliability.

### *1.3 Operational Security*

The operations and storage tanks on site are fully secured and monitored with access strictly regulated. The security measures are designed to prevent unauthorised access and to ensure the integrity of operational data, which is critical for both compliance purposes, environmental protection, and community safety.

Prior to recently receiving some diluted waste fluids into one of the two tanks, this site has been extensively secured with fulltime local security staff, multiple PTZ motion detecting security cameras, as well as multiple layers of fencing. The Security fencing includes a 7-foot outer fence with barbed wire, and inner fence, which is three strand barb wire, and a 3.6-meter high-security fence with a barb wire top around the tanks area. This is for the specific purpose of ensuring the safety and integrity of the operations.



*Exhibit 1- 7 Foot Outer Fence – Security gate with clear signage at front.*



*Exhibit 2 - Inner Fence and Gate with Clear Signage*



*Exhibit 3 - 3.6-meter high-security fence with a barb wire top around the tanks located as a third inner fence which surround the tank containment area.*

1.4 Sump water allegation

Regarding the sump water images, named 6 and 7, it is noted that they are not under water. The stormwater sump is concrete and fully contained that is made for the purpose of being below ground level to collect stormwater and to have the ability to pump from if required.

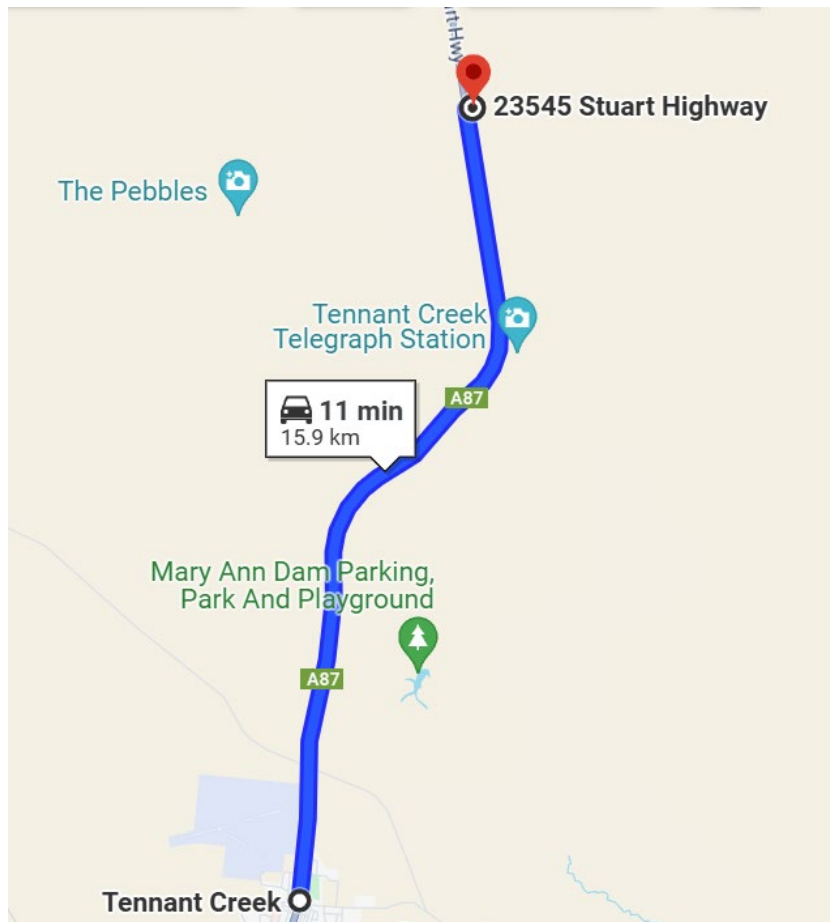
Actual Sumps that are installed in the secondary containment berm areas are to be used for lowering a hose or sump pump into when stormwater collects in the containment area.

1.5 Google Maps allegation

Regarding the google image, it is submitted that these have not been altered by HydrEra. HydrEra does not intend to do so, nor believes it would have any power to do so. The exhibit below is what is shown from Google most recently when zoomed in. It is not blacked out as seen in the exhibit. Appearing at the bottom right, it is seen the last time google updated the image in this location was 1/24/2023 which is prior to HydrEra installing any tanks on the dark crushed gravel area behind the abandoned abattoir.



*Exhibit 4.1- Most recent image on google earth dated as last updated on 1/24/2023. When zoomed in you can clearly see that the dark area is gravel hardstand and not a blacked-out area.*



*Exhibit 4.2 - Property is not exactly near Tennant Creek or next to a playground as alleged. It is actually 15.9km from Tennant Creek and 14,000m from the nearest playground in a triple fenced, manned facility.*

### 1.6 Community Involvement

HydrEra takes pride in its strong commitment to the local community which is reflected in the choice to re-purpose a rundown, abandoned abattoir. As aforementioned, that involved extensive refurbishing and obtaining relevant surveys and environmental approvals. There were also local consultations in which HydrEra representatives attended local councils as well as going door to door in Tennant Creek talking with business owners, workers, and residents for their input. It is noted that the facility is situated a significant distance from residential areas (approximately 15.9km), which minimises potential impacts on the local populace.

Since 2022, HydrEra tanks supplied in Australia have been fabricated in regional Australia by a 100% indigenous owned fabricator. HydrEra has committed to over \$5M in spending with both local Australian suppliers and regional indigenous suppliers in areas in which operate from 2022 to current. Further to that, HydrEra supports local Tennant Creek and Warumungu businesses daily with direct job creation including full-time local site security staff as well as indirect job creation through ongoing operations including the use of local civil companies, accommodation, food, fuel, consumables, mechanical requirements, transport, etc.

HydrEra shares and supports the environmental protection goals outlined by the petitioner, particularly the mutual commitment to the stewardship of freshwater aquifers and surface water resources. HydrEra is dedicated to ensuring these vital resources are managed, protected, and sustained effectively to safeguard the availability for future generations to come.

*Inquiry into the Middle Arm Industrial Precinct:  
Reply to Senate Letter Request of 21 May 2024*

*Final Comment*

HydrEra is committed to being a good corporate citizen and operating in an environmentally safe and responsible manner both in Australia and internationally with a commitment to environmental protection, and water resource preservation in all our fluid management operations. HydrEra maintains open lines of communication with all stakeholders and are fully transparent in all our operations.

In the interest of truth and informed discourse, HydrEra has provided the above response to correct the mistaken assumptions from Mr Tapp and Dr Phelan in the interests of being productive towards the common goal of environmental stewardship. HydrEra is open to providing the Senate with additional feedback as well as accurate and contextual facts about the environmentally safe water storage operations.

We trust this response addresses the adverse evidence raised and demonstrates the dedication to responsible business practices.

Please let us know if further information is needed.

Regards,

Eddie Pigeon  
General Manager - HydrEra Water Services (Australia)